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FEB 24 2005

## FACSIMILE

TO Examiner Truong  
USPTO  
FROM Jeffrey T. Klayman *JK*  
PHONE 617-443-9292  
RE Proposed Agenda for Telephone Conference  
OUR FILE 2386/102 YOUR FILE Serial No. 09/921,986  
FAX 571-273-4042  
PAGES 4 (INCLUDING THIS SHEET)  
DATE 2/24/2005

## COMMENTS

Please see attached.

PLEASE NOTIFY BROMBERG &amp; SUNSTEIN LLP AT (617) 443-9292, IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION.

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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

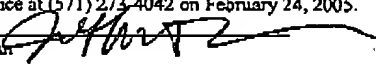
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FEB 24 2005

Applicant: Epstein                      Att'y Docket: 2386/102  
Serial No.: 09/921,986                      Art Unit: 2172  
Filed: August 3, 2001                      Examiner: Truong, C.  
Title: INFORMATION COLLABORATION AND RELIABILITY  
ASSESSMENT

## CERTIFICATE OF FACSIMILE

I hereby certify that this document, along with any other papers referred to as being attached or enclosed, is being transmitted by facsimile to Examiner Cam-Y Truong of the United States Patent and Trademark Office at (571) 273-4042 on February 24, 2005.

Jeffrey T. Klayman PROPOSED AGENDA FOR TELEPHONE CONFERENCE

Dear Examiner Truong:

Thank you for agreeing to a telephonic interview scheduled for Tuesday, March 1, 2005 at 2:00 at telephone number (571) 272-4119. The following is a proposed agenda for our telephone conference:

## 1) GROSS/AYCOCK DO NOT TEACH COLLABORATIVE INFORMATION SYSTEM

Claim 1 is directed toward a collaborative information system. As discussed in the specification, a collaborative information system is generally one in which multiple users can contribute to the database and in which one contributor can modify (or even delete) data provided by another contributor. In neither Gross nor Aycock can one contributor modify or assess data provided by another contributor (e.g., in Aycock, one supplier cannot correct mistakes in another supplier's self-evaluation, nor can one supplier assess the reliability of another supplier's self-evaluation). In these respects, then, neither Gross nor Aycock describe or otherwise suggest a "collaborative" information system in which metadata is used to assess the reliability of the data itself.

## 2) METADATA IS NOT NEW

Metadata, in and of itself, is not new, and the present invention does not merely claim metadata. Rather, the claims are directed generally toward the use of metadata to assess the reliability of the data and the contributors of the data.

## 3) GROSS/AYCOCK DO NOT ASSESS RELIABILITY OF DATA/CONTRIBUTORS

Claim 1 is directed to a collaborative information system in which metadata is used to assess the reliability of the data and contributors of the data. In Gross and Aycock, information provided by users (including so-called "metadata") is used to assess the reliability of entities that are external to the database, such as items offered by on-line vendors (Gross) and potential vendors (Aycock), as opposed to the reliability of the data itself. There is no metadata stored in the databases of Gross and Aycock for assessing the reliability of the information itself or of the contributors of the information. For example, in Gross, the database stores attributes of products that can be used to assess the products, but there is no way to assess whether the attributes stored in the database are correct, so incorrect attributes may lead to an incorrect assessment of the products.

The Examiner points to information, such as a user name and password, that might be requested in Gross, but that information merely identifies the user and does not evaluate the reliability of the user or the user's contributions. Similarly, in Aycock, suppliers provide self-evaluations that are then audited to confirm the information provided by the suppliers and to obtain additional information, but there is no implicit or explicit information that would help a purchasing agent (or anyone else, for that matter) to assess the reliability of information provided by a given supplier.

## 4) PREAMBLE

The Examiner has not given patentable weight to the recitation of a "collaborative information system" in the preamble. Applicants respectfully submit that the claims are allowable over the cited references even without giving this patentable weight. As discussed

above, neither Gross nor Aycock teach or otherwise suggest, alone or in combination with other references, the use of metadata to assess the reliability of the data and the contributors of the data.

Respectfully submitted,



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